

# PUBLIC SUBMISSION

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**Docket:** EBSA-2010-0018

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0018-0002

Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under Patient Protection and Affordable Care Act: Amendment

**Document:** EBSA-2010-0018-DRAFT-0335

Comment on FR Doc # 2011-19684

## Submitter Information

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## General Comment

Centers for Medicare & Medicaid Services  
 Department of Health and Human Services  
 Attention: CMS-9992-IFC2  
 Room 445-G, Hubert H. Humphrey Building  
 200 Independence Avenue, SW  
 Washington, DC 20201

Re: Interim Final Rules defining Religious Employer Exception for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under the Patient Protection and Affordable Care Act, RIN 0938-AQ07

Dear Sir or Madam:

On behalf of Saint Agnes HealthCare, I am writing to urge you to broaden the proposed definition of "religious employer" to ensure conscience protections that will allow us to continue operating our health ministry in a manner consistent with the dictates of our Catholic religious and

social/moral teachings, which oblige us as Catholic employers. Saint Agnes, the first Catholic hospital in Baltimore, Maryland founded by the Daughters of Charity in 1862. We are celebrating our 150-year legacy of providing health care services to citizens of Baltimore without regard to sex, race, age, financial status, or religious conviction. Based on the principles of our founders, the care provided has been in a manner consistent with the moral teachings and beliefs of the Catholic faith. Today, Saint Agnes is a member of Ascension Health, the largest Catholic health care system in the country. Locally, Saint Agnes is a significant health resource for the poor and vulnerable of the communities served and currently employs over 3,000 individuals that support and continue the mission and legacy of our founders.

Catholic healthcare has long worked to ensure that everyone has access to the healthcare they need. For this reason, we welcome the Administration's decision to require health plans to cover women's preventive services, such as critical screenings that will make preventive care more widely available and affordable.

However, while the Interim Final Rule acknowledges the need for conscience protections, we are deeply